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November 20, 1997

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. William Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

RE: **Ex Parte Presentation**
CC Docket 95-185; "LEC-CMRS Interconnection"
CC Docket 96-98; "Local Competition"

Dear Mr. Caton:

On November 19, 1997, Fran Malnati of Bell Atlantic Mobile, Jim Pachulski of Bell Atlantic and the undersigned met with Jeanine Poltronieri, Walt Strack, Jeffrey Steinberg, Dan Grosh, and Kelly Quinn of the Wireless Telecommunications Bureau to discuss LEC-CMRS Interconnection.

In our meeting, we discussed Bell Atlantic's experiences in negotiating local interconnection agreements from both a LEC and CMRS perspective. Since the Commission's adoption of its "Local Competition" Order of August 1996, negotiations have gone extremely well. From a LEC perspective, Bell Atlantic has negotiated and signed more than one hundred interconnection agreements with CMRS carriers. The vast majority of these agreements have been approved by the appropriate state commission, and there have been no cases of arbitration filed. (See Attachment #1).

Bell Atlantic Mobile ("BAM") has had similarly positive experiences in negotiating agreements with non-affiliated LECs. At the time that BAM filed comments in the above referenced proceedings, it was paying interconnection rates in excess of 4¢ and 5¢ per minute in some states. (See Attachment #2). These rates have decreased dramatically since the adoption of the Commission's interconnection rules, and in most cases are less than 1¢ per minute today. While BAM has been involved in a few arbitration proceedings, these proceedings have been resolved to their satisfaction.

The current interconnection process which involves carrier-to-carrier negotiations and state-level approvals and arbitration is working well and should not be changed. In the

event that a state fails to act to carry out its responsibilities under the Telecom Act, the Commission should step in and assume those responsibilities. In Bell Atlantic's view, those instances will be rare.

Please include a copy of this ex parte presentation in the record for the above captioned proceedings. If you have any questions, you may call me on (202) 336-7873.

A handwritten signature in black ink, appearing to read "Dan Ruff". The signature is fluid and cursive, with a large initial "D" and a stylized "Ruff".

Attachments

cc: D. Grosh
J. Poltronieri
K. Quinn
W. Strack
J. Steinberg



Bell Atlantic Agreements with Wireless Carriers

(Effective October 1997)

COMPANY	STATE													
	CT	DC	DE	MA	MD	ME	NH	NJ	NY	PA	RI	VA	VT	WV
360 Communications										<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
American PCS		<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>							<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
AT&T Wireless		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Atlantic Cellular				<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>	
Bell Atlantic Mobile (BAM)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Cellular One (SBC & Amro Cellular (PA)):		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>
COMAV Wireless				<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>					
Comcast			<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>				
D&E Wireless										<input checked="" type="checkbox"/>				
GTE Moblnet (6 parties)												<input checked="" type="checkbox"/> (6)		
Maine Cellular						<input checked="" type="checkbox"/>								
Maine Wireless						<input checked="" type="checkbox"/>								
Nextel Comm. (incl. Smart SMR of NY in NJ)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> (2)	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
PCS Primeco												<input checked="" type="checkbox"/>		
PhillieCo/Sprint Spectrum			<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>				
PriCellular (Northland Cell. & East. Wireless Cell.)									<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/> (2)
Richmond Cellular Tel. Co.												<input checked="" type="checkbox"/>		
SNET Cellular				<input checked="" type="checkbox"/>							<input checked="" type="checkbox"/>			
Southwestern Bell Mobile Systems (Cell. One) *				<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/> *					
Springwich Cellular				<input checked="" type="checkbox"/>										
Sprint Spectrum (Sprint PCS)				<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	
StarCellular						<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>							
Sygnet Communications										<input checked="" type="checkbox"/>				
United States Cellular Corp.					<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Unity/MRCC (Unicel Cellular)						<input checked="" type="checkbox"/>								
Upstate Cellular (Frontier Cellular)									<input checked="" type="checkbox"/>					
Vanguard Cellular Systems						<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>
Virginia Cellular												<input checked="" type="checkbox"/>		
Western Maine Cellular						<input checked="" type="checkbox"/>								
WirelessCo/Sprint Spectrum								<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>
Total Signed:	0	5	6	9	7	10	9	8	13*	10	5	16	6	11
Total Approved:	0	4	5	5	7	7	8	6	13*	6	3	15	5	8

✓ signed agreement

☒ signed and approved agreement

(#) number of agreements if > 1

* Four separate agreements were signed with Southwestern Bell Mobile Systems' New York subsidiaries: Buffalo Telephone Company, Genesee Telephone Company, Albany Telephone Company and Pegasus Cellular Telephone Company.

EXHIBIT A

(Rates applicable in 1996)

**BELL ATLANTIC NYNEX MOBILE (BANM)
LEC INTERCONNECTION USAGE RATE COMPARISON**

- With one exception, BANM receives no mutual compensation from LECs.
- LEC charges to CLECs are considerably less than those to CMRS carriers.

AREA	Mobile to Land ¹ Avg. Rate per minute	Land to Mobile ^{1,2} Avg. Rate per minute	CLEC to LEC ^{3,4} Avg. Rate per minute	LEC to CLEC ^{3,4} Avg. Rate per minute
Arizona	2.55¢	0¢		
Connecticut	4.14¢	1.73¢	0.80¢	(0.80¢)
D.C.	1.50¢	0¢		
Delaware	1.50¢	0¢		
Maine	5.00¢	0¢		
Massachusetts	3.75¢	0.84¢		
Maryland	2.27¢	0¢	0.50¢	(0.30¢)
N. Carolina	2.80¢	0¢		
N. Hampshire	4.00¢	0¢		
New Jersey	2.01¢	0¢		
New Mexico	2.55¢	0¢		
New York	2.59¢	(2.59¢)	0.98¢	(0.98¢)
Pennsylvania	2.32¢	0¢		
Rhode Island	3.75¢	0¢		
S. Carolina	3.00¢	0¢		
Texas	1.70¢	0¢	0¢	0¢
Virginia	2.43¢	0¢		
Vermont	6.41¢	0¢		
West Virginia	2.72¢	0¢		

Notes:

1. "Mobile to Land" Avg. Rates and "Land to Mobile" Avg. Rates represent the average LEC per-minute-of-use charge paid by Bell Atlantic NYNEX Mobile for interconnection to complete intraLATA calls including local exchange calls. The usage charges are based on Type 2A interconnection usage charges that generally consist of local switching and local transport usage charges. Local transport usage charges generally include a distance-sensitive component. The distance-sensitive component assumes typical distances for Bell Atlantic NYNEX Mobile. In some states, the LEC also charges Bell Atlantic NYNEX Mobile a carrier common line charge.

2. On "Land to Mobile" calls in Connecticut and Massachusetts, Bell Atlantic NYNEX Mobile pays the LEC "Land to Mobile" charges for all intraLATA calls it receives that were originated on the LEC network. In New York, the LEC pays Bell Atlantic NYNEX Mobile reciprocal compensation for these calls.

3. The "CLEC to LEC" Avg. Rates and "LEC to CLEC" Avg. Rates generally apply to local exchange calls between competitive local exchange carriers (CLECs) and LEC networks. They were based on the following:

a. Connecticut - Docket No. 94-10-02; DPUC Investigation into the unbundling of the Southern New England Telephone (SNET) Company's Local Telecommunications Network (Dec. 20, 1995). The CLEC to LEC rate shown, SNET's local usage charge, was filed and effective Jan. 3, 1996 as required by the above order. The LEC to CLEC rate shown assumes reciprocal compensation to the CLEC through private agreements. Although CLEC/LEC interconnection in Connecticut is a "bill and keep" arrangement, SNET charges CLECs for use of various unbundled elements pursuant to interim rates effective January 3, 1996. The rate shown is the local port minute of use charge which applies to all calls completed within SNET's local and expanded local calling area.

b. Maryland - PSC Order No. 72348 in Case No. 8584 Phase II, dated Dec. 28, 1995 adopted a rate of 0.5 cents/MOU for interconnection at Bell Atlantic - Maryland (BA-MD) tandems and 0.3 cents/MOU for interconnection at its end offices. BA-MD shall pay new local service entrants the same 0.3 cents/MOU rate for termination of calls on their networks.

c. New York - New York Telephone Company's PSC No. 914 Tariff effective October 20, 1995; The figure shown represents the "day" usage rate for Meet Point B arrangements which include a tandem switching function and an end office switching function which are the same functions used for cellular Type 2A interconnection. Evening and night rates and rates for interconnection at the end office are up to 70% lower than the day rate listed.

d. Texas - Proposed rule 23.97 (to become final on March 27, 1996) provides a 9 month period in which each CTU (certified telecommunications utility) shall reciprocally terminate the other CTU's traffic at no charge. Cellular traffic was explicitly excluded from these interconnection arrangements.

4. Blank spaces in CLEC/LEC Rates indicate that rates have not been determined.

5. "()" indicates compensation paid by LEC to Bell Atlantic NYNEX Mobile or CLECs.